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January 27, 2020

Hon. Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMORANDUM ENDORSED

Re: *United States of America v. Kin Liu Chen*
Ind. No.: 18-CR-827 (GHW)

Dear Judge Woods:

I am retained counsel to Defendant Kin Liu Chen in the above-referenced case. Mr. Chen is scheduled to appear for sentencing on February 12, 2020 at 4:00 p.m.

I write to respectfully request a four-week adjournment of Mr. Chen's sentencing hearing to the week of March 9, 2020, or any date thereafter convenient to the Court. In order to provide Mr. Chen with the effective assistance of counsel at sentencing, I must provide the Court with important information regarding the factors of 18 U.S.C. 3353(a). Despite my best efforts to expeditiously acquire all of this information and incorporate it into my sentencing submission, I am still waiting to receive some necessary information and documentation.

I have spoken with the government, by AUSA Daniel Nessim, who has no objection to this request.

We appreciate your consideration of this letter.


Application granted. The sentencing hearing scheduled for February 12, 2020 is adjourned to March 10, 2020 at 10:00 a.m. Defendant's sentencing memorandum is due February 25, 2020; the Government's memorandum is due March 3, 2020. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 111.

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone
Counsel to Defendant
Kin Liu Chen

SO ORDERED.

Dated: January 31, 2020
New York, New York


GREGORY H. WOODS
United States District Judge